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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

*RE: Docket No. 17-108, Restoring Internet Freedom*

Dear Ms. Dortch:

This submission follows comments I made in the docket from an engineering and economic perspective on the negative impacts of Title II and the 2015 Open Internet Order. <https://www.fcc.gov/ecfs/filing/10829080119475>

It is important that the commission stay the course to restore Internet Freedom, particularly to reduce the current suffering of consumers and innovators under the current policy that benefits the de-facto gatekeepers of the Internet. Moreover the FCC needs to take an additional step to bulletproof its action so that it is not picked apart by opportunistic state utility commissions wishing to establish new regulatory domains over the Internet.

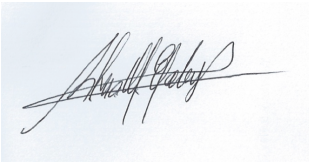
I have lead a live discussion on the problems of fragmentation and disjointed regulation in a class I teach this semester on Managing Distributed Architectures at Florida International University. The students are working in various jobs related to cloud computing, and we have hosted speakers from Microsoft Azure, Amazon, Oracle, the Amsterdam Internet Exchange and so on. We know all too well the problem of regulatory fragmentation abroad and hope such a situation would not happen in the United States. Indeed the very success of the US in information communications technology realm rested on having the rational, light-touch framework under Title I of the Communications Act. Evidence-based, rational and consistent, regulatory policies are important to set up distributed management systems or clouds, to efficiently deliver digital services, to optimize business models, and to ensure privacy, security, and digital freedoms.

From my perspective I already forecast the loss of US leadership playing out in international mobile standards. The setback from the 2015 policy and possible fallout among states means that the US is not well positioned to lead the Internet of the future. The USA has a change to avoid the policy mistakes made by the EU. A historic recall on how the European Union organized itself on 3G and won global leadership in the 1990s shows to its current status a significant fall: aggressive and misguided telecom regulation dried up investment in the EU telecom sector, leading technology companies had struggle to keep up with the USA based Internet companies. Research and development for mobile technologies was redeployed to the market opportunities in the US and East Asia, particularly China.

The US telecom sector was a late embracer of the 3G standards, but it managed to rally and came dominate 4G and the mobile ecosystem (e.g. iPhone). At the time, the US was organized and had a rational national strategy. It's not clear that the same dynamics are in place today. Indeed the academic research in next generation mobile networks is increasingly driven by Chinese, not American or European scholars. It is also the case that the strong Chinese influence is felt when it comes to define Internet standards (IETF) and IEEE standards (e.g. for Internet of Things). This influence can potentially have a long term impact in the industry future in the USA. Therefore I hope the FCC can do its part and restore the national policy and strategy the worked well.

Thank you for your attention. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Silvia Elaluf', with a long horizontal stroke extending to the right.

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